

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	CHAPTER 13
CHERIE LYNISE IRBY	:
fka Cherie Lynise Jackson	CASE NO. 1:14-bk-05756
Debtor	:
 	:
US BANK NATIONAL ASSOCIATION,	:
not in its individual capacity but solely as	:
trustee for the RMAC Trust, Series 2016-	:
CTT c/o Rushmore Loan Management	:
Services,	:
Movant	:
 	:
v.	:
 	:
CHERIE LYNISE IRBY	:
fka Cherie Lynise Jackson,	:
Respondent	:

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Proof of default is demanded at trial and this paragraph is therefore denied. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.
8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
9. Proof of current value of collateral is demanded at trial and this paragraph is therefore denied.

10. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.

11. Denied that Movant has demonstrated cause for relief from stay .

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com